

**REMARKS**

Claims 1-17 are pending.

Claims 1-17 stand rejected under 35 USC §112, first paragraph, as failing to comply with the enablement requirement.

Claims 15-17 stand rejected under 35 USC §103(a) as being allegedly unpatentable over Gordin (US 6,676,277) alone or in view of Bellek (US 3,189,212).

**Changes in the Drawings:**

The drawings have been amended in response to the Examiner's request for the purpose of overcoming the Examiner's objection.

FIGS. 1 and 2 stand objected to on the grounds that the legend "Prior Art" is missing. FIGS. 1 and 2 have been amended to designate FIGS. 1 and 2 with the legend "Prior Art."

The drawings stand objected to how claims 3-17 device cover to be used is not depicted and cannot be clearly understood. In response to the drawing objection, new drawing FIG. 13 has been added to further illustrate the cover and VED relationship as suggested in the Office Action. Support for FIG. 13 derives from applicant's disclosure, and specifically from FIGS. 3, 4, 7, and 10.

No new matter has been added. Approval of the corrections is respectfully requested.

**Changes in the Specification:**

The specification has been amended for the purpose of improving the readability of the application and are of a clerical, typographical or grammatical nature. No new matter has been added.

The specification has been amended in order to incorporate the description of FIG. 13, whose subject matter appears in the description of FIGS. 3, 4, 7, and 10. No new matter has been added.

**Changes in the Abstract:**

The Abstract has been amended in accordance with the Examiner's suggestion.

**Changes in the Claims:**

Claims 1, 5-7, 9, 11, 13-17 have been amended in this application to further particularly point out and distinctly claim subject matter regarded as the invention.

Claims 1 and 15 have been amended to delete the term "electrical connector". No new matter has been added.

**Rejection under 35 USC §112, first paragraph – claims 1-17**

Claims 1-17 stand rejected under 35 USC §112, first paragraph, as failing to comply with the enablement requirement. This rejection is respectfully traversed.

The office action alleges that the claims are based on non-enabling disclosure with respect to the figures. The claims have been amended to further comply with the figures. Claims 1 and 15 have been amended to delete the term "electrical connector".

New FIG. 13 has been added to further clarify how to make and use what is regarded as the invention.

The claims now meet the statutory requirements.

**Rejection under 35 USC §103(a) – claims 15-17**

Claims 15-17 stand rejected under 35 USC §103(a) as being allegedly unpatentable over Gordin alone or in view of Bellek. This rejection is respectfully traversed.

Under MPEP §706.02(j), in order to establish a prima facie case of obviousness required for a §103 rejection, three basic criteria must be met: (1) there must be some suggestion or motivation either in the references or knowledge generally available to modify the reference or combine reference teachings (MPEP §2143.01), (2) a reasonable expectation of success (MPEP §2143.02), and (3) the prior art must teach or suggest all the claim limitations (MPEP §2143.03). See In re Royka, 490 F. 2d 981, 180 USPQ 580 (CCPA 1974).

Gordin alone or in combination with Bellek do not describe or suggest all of the claim limitations of claims 15. In particular, “means for aligning” is supported by the specification at page 13, lines 6-7: a track in L-shape allows the cover to be align in a particular position. Neither Gordin nor Bellek describe or suggest a track in L-shape. “means for supporting” the cover when the cover is in an opened position is supported by the specification at page 14, lines 11-13: guide plates containing the L-shape tracks allow the cover to be rotated 90 degrees to an open and locked positions. Neither Gordin nor Bellek describe or suggest guide plates containing the L-shape tracks.

Applicant therefore submits that the rejection based Gordin and/or Bellek reference is improper and should be withdrawn. Thus, Applicant submits that claims 15-17 recite novel subject matter which distinguishes over any possible combination of Gordin and/or Bellek.

### **Conclusion**

For all of the above reasons, applicants submit that the amended claims are now in proper form, and that the amended claims all define patentable subject matter over the prior art. Therefore, Applicants submit that this application is now in condition for allowance.

### **Request for allowance**

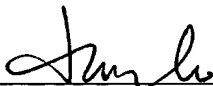
It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited. If, in the opinion of the Examiner, an interview would expedite the

prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

The Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 50-1698. A duplicate of this transmittal page is enclosed.

Respectfully submitted,  
THELEN REID & PRIEST LLP

Dated: November 15 2004

  
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Attachments

**Amendments to the Drawings:**

Corrected drawings FIGS. 1 and 2, and new drawing FIG. 13 are submitted herewith for approval.

Corrections are indicated in red ink on the annotated sheet showing changes.

Attachment: Replacement Sheet

Annotated Sheet Showing Changes



ANNOTATED MARKED-UP DRAWING

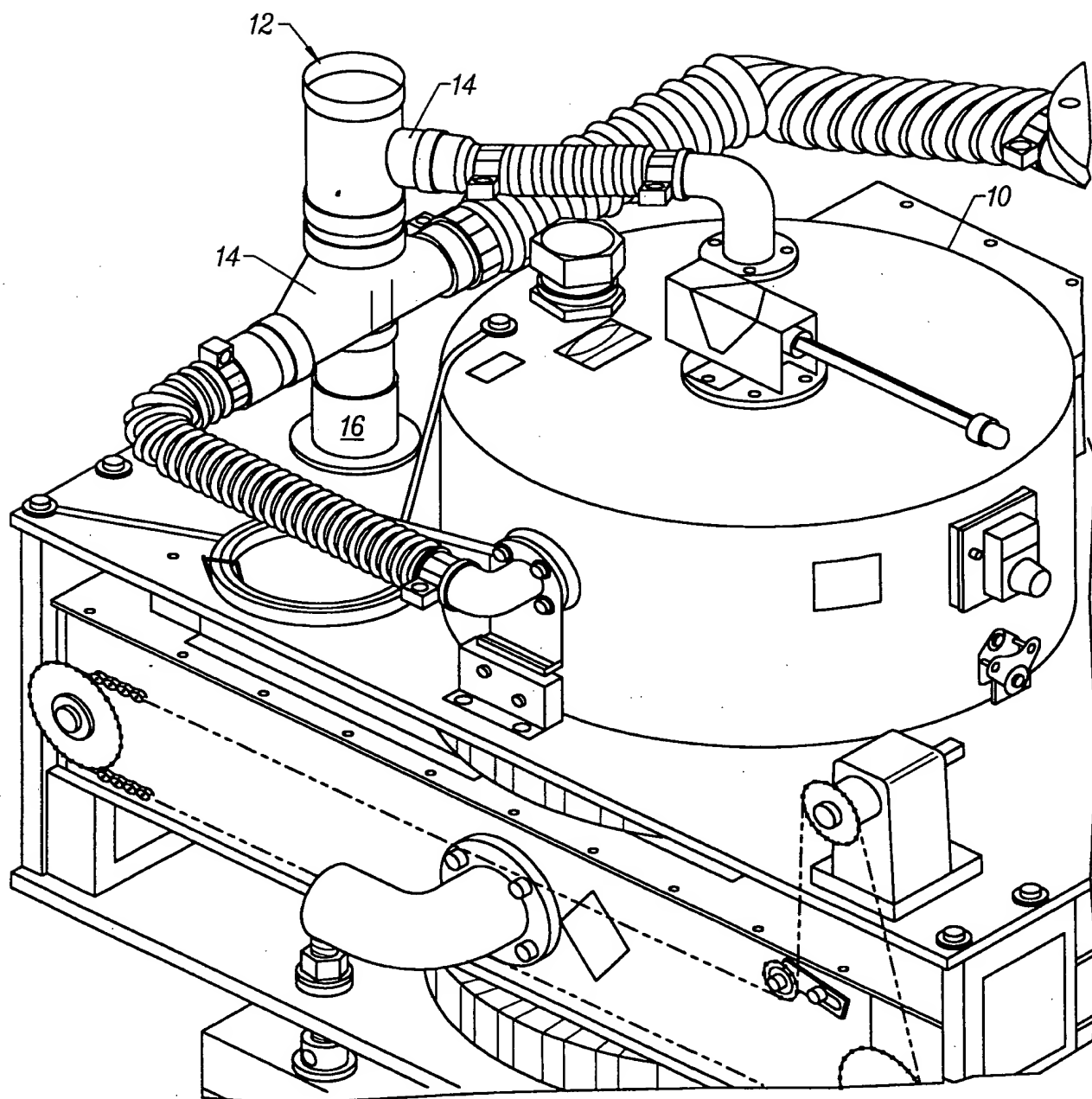


FIG. 1  
PRIOR ART



ANNOTATED MARKED-UP DRAWING

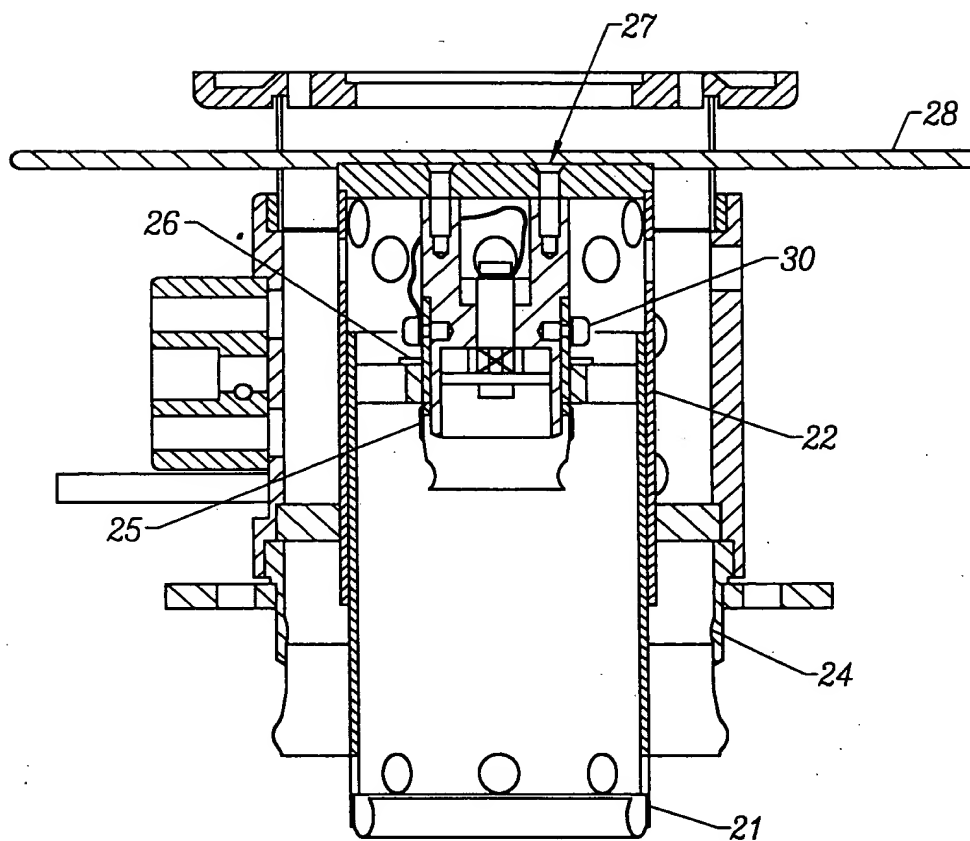


FIG. 2  
PRIOR ART